

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of

PUGET SOUND ENERGY and
NW ENERGY COALITION

For an Order Authorizing PSE to Implement
Electric and Natural Gas Decoupling
Mechanisms and to Record Accounting
Entries Associated with the Mechanisms

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY

Respondent.

DOCKET NOS. UE-121697 and
UG-121705 (Consolidated)

DOCKET NOS. UE-130137 and
UG-130138 (Consolidated)

JOINT PETITION TO MODIFY
ORDER 07

I. INTRODUCTION

1 Pursuant to WAC 480-07-370 and WAC 480-07-875, the Joint Petitioners seek to modify certain terms in Order 07 in these dockets. Specifically, the Joint Petitioners have agreed to extend the date by which Puget Sound Energy (“PSE” or the “Company”) must file a general rate case, and the Joint Petitioners ask the Commission to modify Order 07 to reflect the terms of this agreement.

2 The Joint Petitioners are: PSE, Commission Staff, Public Counsel, Industrial Customers of Northwest Utilities, Northwest Industrial Gas Users, The Energy Project, NW

Energy Coalition, Federal Executive Agencies and the Sierra Club. Parties from PSE's 2011 GRC who do not oppose the petition are: Nucor Steel, Kroger, and Cost Management Services.

3 In Order 07, the Commission authorized a multi-year rate plan with an annual escalation factor, also referred to as the K-factor ("rate plan"). In addition, the Commission "approve[d] the NWECA/PSE Amended Decoupling Petition and allow[ed] the proposed electric and natural gas decoupling mechanisms to become effective as filed." Order 07 ¶ 136. The Amended Decoupling Mechanisms included a rate case stay out period during the initial term of the decoupling mechanism. The Amended Decoupling Petition stated that: "The mechanism will remain in place, at a minimum, until the effective date of new rates set in PSE's next general rate case. PSE will file a general rate case no sooner than April 1, 2015, and no later than April 1, 2016, unless otherwise agreed to by the parties to PSE's last general rate case." Order 07 ¶ 9, fn. 9 (citing Amended Decoupling Petition ¶ 20).

4 All parties to PSE's 2011 general rate case have either agreed to request that the Commission extend the date for PSE to file its general rate case, or do not oppose this request. As discussed in more detail below, the Joint Petitioners request that the Commission extend the date for filing PSE's next general rate case to "no later than January 17, 2017."

5 The following rules or statutes may be brought into issue by this petition: RCW 80.01.040, WAC 480-07-370, and WAC 480-07-875.

II. THE COMMISSION SHOULD MODIFY ORDER 07 TO ALLOW PSE TO FILE ITS RATE CASE NO LATER THAN JANUARY 17, 2017

6 The Amended Decoupling Petition and the Order approving the Amended Decoupling Petition required PSE to "file a general rate case no sooner than April 1, 2015,

and no later than April 1, 2016, unless otherwise agreed to by the parties to PSE's last general rate case." Order 07 ¶ 9 and n. 9 (citing Amended Decoupling Petition ¶ 20). The Joint Petitioners request that the Commission modify its Order to allow PSE to file its general rate case no later than January 17, 2017.

7 The Joint Petitioners' proposal is in the public interest for several reasons. First, PSE has been working, and continues to work, towards developing a plan to address the future of Colstrip Units 1 and 2. The additional nine months will allow PSE additional time to work with stakeholders and to prepare a proposal addressing these units to include in its general rate case filing. Second, Staff, Public Counsel and other intervenors face significant workload pressures associated with numerous other rate cases and other filings that are currently pending with the Commission. A filing in January 2017 will alleviate some of the workload pressures on these parties. Third, as part of the agreed upon plan, PSE will update variable power costs effective December 1, 2016, as described in more detail below. Fourth, customers will continue to share in any earnings in excess of PSE's authorized rate of return, through the earnings sharing mechanism currently in place.

8 In light of the above, the Joint Petitioners have agreed to a delay in the filing of PSE's general rate case, under the following terms:

- a. PSE will file a general rate case no later than January 17, 2017, and no further extensions will be sought with respect to the general rate case filing. The provisions for emergency rate relief set forth in footnote 20, page 13 of the Amended Decoupling Petition continue to apply, except that PSE will not file new deferred accounting petitions, other than as set forth in section e, below.

- b. PSE commits to include a comprehensive plan addressing the future of Colstrip Units 1 and 2 in its next general rate case, including: a depreciation schedule for all four units that aligns with the Company's most current analysis of the plants' useful life; an analysis of Units 1 and 2 that includes known major maintenance obligations and their projected costs; a narrow window of dates for the planned retirement of Units 1 and 2; detailed information regarding planned decommissioning and remediation activities for Units 1 and 2, including costs associated therewith; and a basic framework for how power replacement decisions will be made if the planned retirement of Units 1 and 2 is out of sync with the development of the 2017 Integrated Resource Plan.
- c. The previously authorized Centralia compliance filing to be made by PSE on or before October 1, 2016, will include a limited update¹ to variable power costs with updated rates in Schedule 95 and the updated PCA baseline rate to go into effect on December 1, 2016.
- d. The Joint Petitioners agree that there will be no extension of the rate plan beyond what the Commission has previously authorized. In this regard, the Joint Petitioners acknowledge and agree that the filings in this docket include monthly allowed revenue per customer values through December 2017. As a result, on or before April 1, 2016, PSE will file to update its Gas Schedule 142 Monthly Allowed Revenue Per Customer tables for each group of Decoupled Customers to reflect the values listed for the remaining months of 2017 in Exhibit No. JPG-5 in Docket No. UG-121705. Similarly, PSE will file to update its Electric Schedule 142 Monthly

¹ Updates will be made to the variable power costs reflected on Exhibit A-1 from the 2014 Power Cost Only Rate Case (PCORC) for FERC accounts 547- Fuel; 555- Purchased Power; 447-Sales to Others; 456- Purch/Sales Non-Core Gas.

Allowed Revenue Per Customer tables for each group of Decoupled Customers. The electric values for the remaining months of 2017 are listed in Exhibit No. JPE-6 and page 2 of Exhibit No. JPE-2, as amended and provided as workpapers in Docket No. UE-141213. Exhibit No. JPG-5 and workpapers JPE-6 and page 2 of JPE-2 are provided in Attachment A to this petition. PSE's decoupling mechanisms will otherwise continue to operate as they currently do through its Schedule 142 tariffs and regularly scheduled annual filings. Other rate plan customers that do not participate in the decoupling mechanisms already have approved rate plan increases to rates through the end of 2017 and no further tariff changes are required for these customers.

- e. PSE will not file any new deferred accounting petitions until the filing of its general rate case. This does not preclude the Commission from acting on accounting petitions that have already been filed with the Commission at the time of the filing of this petition. This does not alter PSE's right to continue all approved deferrals, including but not limited to its storm deferrals. Further, this does not preclude PSE from filing for deferred accounting for a catastrophic event such as an earthquake or other force majeure occurrences.
- f. The rate plan provisions regarding the earnings sharing mechanism and the low income bill² and weatherization assistance³ will continue to apply until rates

² Dockets UE-111048 and UG-111049 set the low-income bill assistance program at \$20.2 million per year and PSE agreed to increase this amount in the decoupling dockets by \$1.0 million, for a total of \$21.2 million per year. See Decoupling Final Order, Order 07 ¶ 182. Additionally, the provisions of the decoupling mechanism provide for further increases to the annual program funding in proportion to the residential bill impacts of the annual decoupling filing. This level of funding will continue until rates determined in PSE's general rate case go into effect.

³ In the decoupling dockets, PSE agreed to increase funding for low-income conservation by \$500,000 annually. See Order 07 page 76. Shareholders committed to provide \$100,000 per year for low-income energy efficiency funding also. This funding will continue until rates determined in PSE's general rate case go into effect.

determined in PSE's general rate case go into effect, including but not limited to the timing and content of any necessary rate change filings associated with these provisions. Consistent with the existing decoupling provisions, any overearnings will be passed back to customers on May 1, 2016 and May 1, 2017 in conjunction with the rate effective date of the decoupling rate change.

g. PSE may file its new depreciation study before its general rate case filing, but any rate increase associated with updated depreciation schedules and the use of the depreciation rates would not go into effect until new rates are set through the general rate case.

h. The Joint Petitioners agree to support, or not oppose, amendment of PSE's Power Cost Adjustment Settlement in Docket No. UE-130617 to extend the deferral of the revenue variances until the new effective date for rates in PSE's next general rate case.⁴

9 The Commission has authority to alter or amend its prior orders after notice to the parties in the underlying proceeding.⁵ In this case, all parties to the current dockets have been notified of the proposed modification. Further, an extension of the deadline for PSE's general rate case filing is allowed under the terms of the Amended Decoupling Petition and Order 07 in this docket, if all parties to PSE's 2011 general rate case agree to such extension. All parties to PSE's 2011 general rate case, Docket Nos. UE-111048 and UG-111049, have been notified of and served with this petition, and all the parties join in this petition or do not oppose this petition. Accordingly, the Joint Petitioners request that the Commission modify Order 07 in this docket, as set forth in this petition.

⁴ See Docket UE-130617, Order 11, ¶ 15.

⁵ See WAC 480-07-875(1).

III. CONCLUSION

10

For the reasons set forth above, the Joint Petitioners respectfully request the Commission modify Order 07 as requested in this petition.

DATED this 9th day of March 2016.

PERKINS COIE LLP

Sheree Strom Carson
Donna L. Barnett
Attorneys for Puget Sound Energy

ROBERT W. FERGUSON
Attorney General

Summit for Climate - Palashadi for

Sally Brown
Senior Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission

ROBERT W. FERGUSON
Attorney General

DAVISON VAN CLEVE, PC

Lisa W. Gaffken
Assistant Attorney General
Public Counsel Unit

Tyler Pepple
Counsel for ICNU

EARTHJUSTICE

**CABLE HUSTON BENEDICT
HAAGENSEN & LLOYD LLP**

Amanda W. Goodin
Counsel for NW Energy Coalition

CHAD M. STOKES
Counsel for NWIGU

FEDERAL EXECUTIVE AGENCIES

THE ENERGY PROJECT

Rita M. Liotta
Counsel for Federal Executive Agencies

Ronald E. Roseman,
Counsel for The Energy Project

SIERRA CLUB

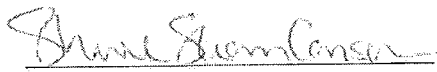
Travis Ritchie
Counsel for Sierra Club

III. CONCLUSION

10 For the reasons set forth above, the Joint Petitioners respectfully request the Commission modify Order 07 as requested in this petition.

DATED this 8 day of March 2016.

PERKINS COIE LLP



Sheree Strom Carson
Donna L. Barnett
Attorneys for Puget Sound Energy

ROBERT W. FERGUSON
Attorney General

Sally Brown
Senior Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission

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Attorney General

DAVISON VAN CLEVE, PC

Lisa W. Gafken
Assistant Attorney General
Public Counsel Unit

Tyler Pepple
Counsel for ICNU

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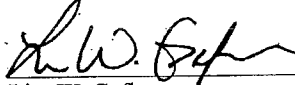
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SIERRA CLUB

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ROBERT W. FERGUSON
Attorney General

Sally Brown
Senior Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission

DAVISON VAN CLEVE, PC

Tyler Pepple
Counsel for ICNU

**CABLE HUSTON BENEDICT
HAAGENSEN & LLOYD LLP**

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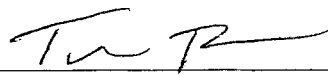
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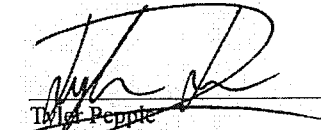
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EARTHJUSTICE

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Counsel for NW Energy Coalition

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HAAGENSEN & LLOYD LLP**

CHAD M. STOKES
Counsel for NWIGU

THE ENERGY PROJECT



Ronald E. Roseman,
Counsel for The Energy Project

ATTACHMENT A

Puget Sound Energy
Decoupling Filing
Development of Monthly Allowed Delivery Revenue Per Customer - Natural Gas

Line No.	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)
		Source	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
1															
2	Gas Sales														
3	Residential														
4	- Weather-Normalized Therm Sales	UG-130138 WP	82,909,423	76,920,931	65,310,361	46,709,364	29,241,746	18,879,747	14,919,652	13,782,269	19,093,379	39,965,906	67,290,741	84,664,518	559,688,037
5	- % of Annual Total	% of (C)(o);R(4)	14.81%	13.74%	11.67%	8.35%	5.22%	3.37%	2.67%	2.46%	3.41%	7.14%	12.02%	15.13%	100.00%
6	Non-Residential*														
7	- Weather-Normalized Therm Sales	UG-130138 WP	39,772,899	37,019,925	33,291,578	25,546,855	19,126,649	14,823,180	13,263,985	12,496,754	13,836,050	21,770,851	32,673,023	40,401,872	304,023,622
8	- % of Annual Total	% of (C)(o);R(8)	13.08%	12.18%	10.95%	8.40%	6.29%	4.98%	4.36%	4.11%	4.55%	7.16%	10.75%	13.29%	100.00%
9															
10															
11	Monthly Allowed Volumetric Delivery Revenue Per Customer (RPC)														
12	Residential														
13	- 2014 Allowed Volumetric Delivery RPC	JPG-4													
14	- 2014 Monthly Allowed Volumetric Delivery RPC	(5) x (13)	\$ 45.53	\$ 42.24	\$ 35.86	\$ 25.65	\$ 16.06	\$ 10.37	\$ 8.19	\$ 7.57	\$ 10.48	\$ 21.95	\$ 36.95	\$ 46.49	\$ 307.34
15	- 2015 Allowed Volumetric Delivery RPC	JPG-4													
16	- 2015 Monthly Allowed Volumetric Delivery RPC	(5) x (16)	\$ 46.94	\$ 43.55	\$ 36.97	\$ 26.44	\$ 16.55	\$ 10.69	\$ 8.45	\$ 7.80	\$ 10.81	\$ 22.63	\$ 38.10	\$ 47.93	\$ 316.86
17	- 2016 Allowed Volumetric Delivery RPC	JPG-4													
18	- 2016 Monthly Allowed Volumetric Delivery RPC	(5) x (19)	\$ 48.38	\$ 44.89	\$ 38.11	\$ 27.26	\$ 17.06	\$ 11.02	\$ 8.71	\$ 8.04	\$ 11.14	\$ 23.32	\$ 39.27	\$ 49.40	\$ 326.59
19	- 2017 Allowed Volumetric Delivery RPC	JPG-4													
20	- 2017 Monthly Allowed Volumetric Delivery RPC	(5) x (22)	\$ 49.85	\$ 46.25	\$ 39.27	\$ 28.09	\$ 17.59	\$ 11.35	\$ 8.97	\$ 8.29	\$ 11.48	\$ 24.03	\$ 40.46	\$ 50.91	\$ 336.53
21															
22															
23															
24															
25	Non-Residential*														
26	- 2014 Allowed Volumetric Delivery RPC	JPG-4													
27	- 2014 Monthly Allowed Volumetric Delivery RPC	(9) x (26)	\$ 192.01	\$ 178.72	\$ 160.72	\$ 123.33	\$ 92.33	\$ 71.56	\$ 64.03	\$ 60.33	\$ 66.79	\$ 105.10	\$ 157.73	\$ 195.04	\$ 1,467.69
28	- 2015 Allowed Volumetric Delivery RPC	JPG-4													
29	- 2015 Monthly Allowed Volumetric Delivery RPC	(9) x (29)	\$ 197.69	\$ 184.01	\$ 165.47	\$ 126.98	\$ 95.07	\$ 73.68	\$ 65.93	\$ 62.11	\$ 66.77	\$ 108.21	\$ 162.40	\$ 200.81	\$ 1,511.13
30	- 2016 Allowed Volumetric Delivery RPC	JPG-4													
31	- 2016 Monthly Allowed Volumetric Delivery RPC	(9) x (32)	\$ 203.50	\$ 189.41	\$ 170.33	\$ 130.71	\$ 97.86	\$ 75.84	\$ 67.86	\$ 63.94	\$ 70.79	\$ 111.39	\$ 167.17	\$ 206.71	\$ 1,555.52
32	- 2017 Allowed Volumetric Delivery RPC	JPG-4													
33	- 2017 Monthly Allowed Volumetric Delivery RPC	(9) x (35)	\$ 209.43	\$ 194.93	\$ 175.30	\$ 134.52	\$ 100.71	\$ 78.05	\$ 69.84	\$ 65.80	\$ 72.86	\$ 114.64	\$ 172.05	\$ 212.74	\$ 1,600.89
34															
35															
36															
37															
38															

* Includes Schedules 31, 31T, 41, 41T, 86, & 86T. Rates for special contract customers are governed by their contracts.

Puget Sound Energy
Decoupling Proposal - Revised July 1, 2014
Development of Monthly Allowed Delivery Revenue Per Customer - Electric Schedules 10, 12, 26 & 31

Line No.	Source	Jan (c)	Feb (d)	Mar (e)	Apr (f)	May (g)	Jun (h)	Jul (i)	Aug (j)	Sep (k)	Oct (l)	Nov (m)	Dec (n)	TOTAL (o)
1	Electric Demand Charge Revenue													
2	Schedule 12 & 26													
3	- Demand Charge Revenue	3,555,062	3,518,793	3,548,895	2,292,242	2,429,379	2,374,508	2,457,786	2,459,169	2,559,594	3,804,153	3,693,581	3,703,735	36,396,896
4	- % of Annual Total	9.77%	9.67%	9.75%	6.30%	6.87%	6.52%	6.75%	6.76%	7.03%	10.45%	10.15%	10.18%	100.00%
5														
6	Schedule 10 & 31													
7	- Demand Charge Revenue	2,510,935	2,548,421	2,533,847	1,644,423	1,682,277	1,662,256	1,722,637	1,729,652	1,791,866	2,691,575	2,618,960	2,562,234	25,698,084
8	- % of Annual Total	9.77%	9.92%	9.86%	6.40%	6.55%	6.47%	6.70%	6.73%	6.87%	10.47%	10.19%	9.97%	100.00%
9														
10	Monthly Allowed Delivery Revenue Per Customer (RPC)													
11	Schedule 12 & 26													
12	- 2013 Allowed Volumetric Delivery RPC	4,419.43	4,374.34	4,411.76	2,849.57	3,020.05	2,951.84	3,055.36	3,057.08	3,161.93	4,729.08	4,591.63	4,604.25	45,246.32
13	- 2013 Monthly Allowed Volumetric Delivery RPC	(5) x (13)												
14	- 2014 Allowed Volumetric Delivery RPC	4,555.94	4,509.46	4,548.04	2,937.59	3,113.34	3,043.02	3,149.74	3,151.51	3,280.21	4,875.16	4,733.46	4,746.47	46,643.92
15	- 2014 Monthly Allowed Volumetric Delivery RPC	(5) x (16)												
16	- 2015 Allowed Volumetric Delivery RPC	4,696.54	4,648.63	4,688.40	3,028.25	3,209.42	3,136.93	3,246.95	3,248.77	3,381.44	5,025.61	4,879.54	4,892.95	48,083.44
17	- 2015 Monthly Allowed Volumetric Delivery RPC	(5) x (19)												
18	- 2016 Allowed Volumetric Delivery RPC	4,841.37	4,791.98	4,832.97	3,121.63	3,308.38	3,233.66	3,347.07	3,348.95	3,465.72	5,180.59	5,030.01	5,043.83	49,566.15
19	- 2016 Monthly Allowed Volumetric Delivery RPC	(5) x (22)												
20	- 2017 Allowed Volumetric Delivery RPC	4,990.54	4,939.62	4,981.88	3,217.81	3,410.32	3,333.29	3,450.20	3,452.14	3,593.11	5,340.21	5,184.99	5,199.24	51,093.34
21	- 2017 Monthly Allowed Volumetric Delivery RPC	(5) x (25)												
22	Schedule 10 & 31													
23	- 2013 Allowed Volumetric Delivery RPC	5,194.05	5,271.59	5,241.45	3,401.61	3,479.91	3,436.50	3,563.40	3,575.84	3,706.60	5,567.72	5,417.51	5,300.17	53,168.34
24	- 2013 Monthly Allowed Volumetric Delivery RPC	(9) x (29)												
25	- 2014 Allowed Volumetric Delivery RPC	5,362.40	5,442.46	5,411.33	3,511.86	3,592.70	3,549.94	3,678.90	3,691.74	3,826.74	5,748.18	5,593.10	5,471.95	54,881.30
26	- 2014 Monthly Allowed Volumetric Delivery RPC	(9) x (32)												
27	- 2015 Allowed Volumetric Delivery RPC	5,535.80	5,618.44	5,596.31	3,625.42	3,708.88	3,664.74	3,797.86	3,811.12	3,950.48	5,934.05	5,773.96	5,648.90	56,655.95
28	- 2015 Monthly Allowed Volumetric Delivery RPC	(9) x (35)												
29	- 2016 Allowed Volumetric Delivery RPC	5,714.40	5,799.71	5,766.54	3,742.39	3,828.53	3,782.97	3,920.39	3,934.08	4,077.94	6,125.50	5,960.24	5,831.15	58,483.84
30	- 2016 Monthly Allowed Volumetric Delivery RPC	(9) x (38)												
31	- 2017 Allowed Volumetric Delivery RPC	5,896.36	5,886.42	5,952.18	3,862.86	3,951.78	3,904.75	4,046.59	4,060.72	4,209.22	6,322.69	6,152.12	6,018.66	60,366.56
32	- 2017 Monthly Allowed Volumetric Delivery RPC	(9) x (41)												

Puget Sound Energy
Decoupling Filing - Revised July 1, 2014
Development of Monthly Allowed Delivery Revenue Per Customer - Electric

Line No.	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL		
1															
2	Electric Sales														
3	Residential														
4	- UE-130137 WP	1,225,472,256	1,173,019,250	1,080,324,157	963,795,546	778,961,308	722,950,458	674,685,207	663,742,032	670,364,847	700,450,453	934,362,575	1,177,437,609	10,765,565,699	
5	- % of Annual Total	11.38%	10.90%	10.03%	8.85%	7.24%	6.72%	6.27%	6.17%	6.23%	6.51%	8.68%	10.94%	100.00%	
6	Non-Residential*														
7	- UE-130137 WP	636,223,328	613,826,290	617,897,321	572,596,435	534,453,533	553,212,979	549,241,201	569,240,559	578,799,754	555,059,440	590,872,747	633,415,634	7,004,839,221	
8	- Weather-Normalized kWh Sales														
9	- % of Annual Total	9.06%	8.76%	8.82%	8.17%	7.83%	7.90%	7.84%	8.13%	8.26%	7.92%	8.44%	9.04%	100.00%	
10															
11	Monthly Allowed Delivery Revenue Per Customer (RPC)														
12	Residential														
13	- 2014 Allowed Volumetric Delivery RPC		34.29	31.58	28.18	22.77	21.14	19.72	19.40	19.60	20.48	27.32	34.42	314.73	
14	- 2014 Monthly Allowed Volumetric Delivery RPC													314.73	
15	- 2015 Allowed Volumetric Delivery RPC		35.83	32.82	28.28	23.67	21.96	20.50	20.17	20.37	21.28	28.39	35.77	327.08	
16	- 2015 Monthly Allowed Volumetric Delivery RPC													327.08	
17	- 2016 Allowed Volumetric Delivery RPC		37.02	34.10	30.42	24.59	22.82	21.30	20.95	21.16	22.11	29.49	37.16	339.80	
18	- 2016 Monthly Allowed Volumetric Delivery RPC													339.80	
19	- 2017 Allowed Volumetric Delivery RPC		38.68	35.41	31.59	25.53	23.70	22.12	21.76	21.97	22.96	30.63	38.60	352.90	
20	- 2017 Monthly Allowed Volumetric Delivery RPC													352.90	
21															
22	Non-Residential*														
23	- 2014 Allowed Volumetric Delivery RPC		116.60	117.37	108.77	101.52	105.09	104.33	108.13	109.95	105.44	112.24	120.32	1,330.60	
24	- 2014 Monthly Allowed Volumetric Delivery RPC													1,330.60	
25	- 2015 Allowed Volumetric Delivery RPC		125.11	121.50	112.60	105.10	108.78	106.00	111.94	113.82	109.15	116.19	124.56	1,377.44	
26	- 2015 Monthly Allowed Volumetric Delivery RPC													1,377.44	
27	- 2016 Allowed Volumetric Delivery RPC		129.49	125.76	116.54	108.78	112.59	111.79	115.86	117.80	112.97	120.26	128.92	1,425.68	
28	- 2016 Monthly Allowed Volumetric Delivery RPC													1,425.68	
29	- 2017 Allowed Volumetric Delivery RPC		134.00	129.29	130.14	120.60	116.52	115.68	119.89	121.91	116.91	124.45	133.41	1,475.37	
30	- 2017 Monthly Allowed Volumetric Delivery RPC													1,475.37	
31															
32															
33															
34															
35															
36															
37															
38															

* Schedules 24, 25, 29, 35, 40, 43, 46, 49, as well as related schedules eligible for BPA Res. Exchange.